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From: Rachel Barrett [REDACTED]
Sent: 06 February 2026 15:19
To: Planning Policy Consultations
Cc: Rosalind Tennant; WHSCoordinator
Subject: HRP Reps CoL Plan 2040 Main Modification Consultation
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Hello,

Please find attached Historic Royal Palaces responses to the CoL MM consultation.

Please can you confirm receipt.

Best wishes,

Rachel Barrett
Project Manager



Surveyor of the Fabric [REDACTED]
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6 February 2026

Planning Policy Team
Environment Department
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Dear Planning Policy Consultation team,

Representations to the City Plan 2040 Modifications Consultation – 15 December 2025 to 6 February 2026

We write as guardians of the Tower of London World Heritage Site (WHS) in response to City of London's (CoL) City Plan 2040 Modifications consultation (2025/6).

Historic Royal Palace's (HRP) Tower of London (ToL) is a site of utmost international historical significance, recognised by its inscription as a World Heritage Site (WHS). HRP is committed to delivering public benefits through its conservation of the Tower and providing open access to the site. Preserving the Outstanding Universal Value (OUV) of the WHS and its setting is key and as such HRP has taken a keen and active interest in the development of the new CoL City Plan, particularly its policies relating to tall buildings, and has made representations at all stages of consultation, including to the EIP hearings.

Summary

HRP welcomes a number of the individual Main Modifications, which reflect the constructive discussions at the Examination in Public. However, it does not believe that the Modifications overall are sufficient to ensure the draft Plan is sound as they do not adequately address the issues consistently raised by HRP throughout the Plan development process relating to the impact of the tall building heights for the proposed City Cluster on the OUV and setting of the ToL WHS, and the fundamental contradiction between the draft Plan's heritage and tall buildings policies.

The risks to the WHS status of the ToL from inappropriate development have been clearly set out by HRP (and HE) throughout this process. This has been emphasised by the UNESCO World Heritage Committee (in its decision regarding the Palace of Westminster and Westminster Abbey including St Margarets Church WHS, in July



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2025) and by ICOMOS International in its Technical Reviews of the City Plan (October 2024) and of the state of conservation of the WHS (July 2025).

Whilst the ToL is located just outside the boundary of the City Corporation, a large part of the City lies within the local setting of the WHS, and the backdrop of its landmark position as a fortress on the Thames to the north and west also lies within the City of London authority. Given the sensitivity of the WHS to the impact of new development and tall buildings within these areas, and potential to further erode the OUV and harm its heritage significance, it is essential that the City Plan appropriately and sensitively plans for new development in the setting of the WHS.

HRP's response

We do not repeat here the detail of HRP's previous consultation responses and EIP submissions, which form part of the Examination Library; instead, we set out briefly below HRP's response to the latest Main Modifications relating to the Heritage and Tall Buildings policies.

HRP welcomes several of the Main Modifications, including:

- **MM41**, which further emphasises the importance that opportunities to enhance conservation areas should be taken where available;
- **MM42**, which is an addition that requires all new development, including tall buildings, within a conservation area to demonstrate how it would preserve and (where possible) enhance the conservation area;
- **MM44**, which requires reference to the Setting Study for St Paul's Cathedral, where appropriate;
- **MM54**, which is a minor change that requires the CoL to assess the cumulative impacts of proposed tall buildings on the historic environment, townscape and skyline;
- **MM50** and **MM63**, which remove references to immediate setting;
- **MM57**, which includes a reference to the settings of historic City landmarks and skyline features;
- **MM46**: HRP also welcomes the *aim* of minor amendment MM46, which adds the requirement for Heritage Impact Assessments submitted with proposals for development affecting the setting of the ToL WHS to demonstrate consideration of OUV. However, HRP considers that the use of the term 'interpreted' in relation to OUV is unhelpful and that this implies there is flexibility in how OUV is used to shape development proposals; it suggests



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that the text is amended to read: ‘...that shows how the OUV of the Tower of London has informed development proposals’;

- HRP notes and supports the removal of the reference to ‘2016’ (**AM75**) in relation to the World Heritage Site Management Plan in Policy S13 (3) and suggests that the same is necessary at paras 11.4.3 and 11.6.6, given that the updated Management Plan is to be expected to be published shortly.

HRP does not support the following Modifications:

- **MM47**: HRP notes the proposed amendment (MM47) to the supporting text for Policy HE3 (new para. 11.4.0), which states that:

The City Corporation has interpreted the ToL’s OUV through an analysis of attributes and this has informed the contour lines of the City Cluster in policy S12. Policy HE3 preserves, and seeks to enhance, the ToL’s OUV, as experienced in the relevant views, including those where the City Cluster is visible.

HRP does not support this modification on the basis of its concern, raised consistently throughout the Plan development period, that the evidence base for the draft City Plan (including the ToL HIA and SVIA) fails to properly assess the impact of the City Cluster on the ToL WHS and understates its impact. HRP has previously highlighted that the conclusions of the HIA and the resulting City Cluster contours do not reflect the content of the HIA. It maintains that the evidence base (including the HIA Addendum) does not support or effectively evidence that the effects of the proposed City Cluster on the OUV of the ToL would not be major and of substantial concern. HRP cannot therefore support a modification that claims the City Corporation’s analysis of the attributes of OUV has informed the contours, and when there are locations within the proposed City Cluster where tall buildings will be visible and impact OUV. HRP therefore considers that the sentence that begins ‘*The City Corporation has interpreted...*’ should be removed.

CoL has in the last year issued the decision notice to refuse Planning Application Ref: 24/00021/FULEIA in respect of the redevelopment of Bury House, Bury Street, EC3A 5AR to provide a tall building. The reasons for refusal included the adverse effect of the proposed development ‘*on the setting of the Tower of London World Heritage Site by reason of less than substantial harm caused via LVMF view 10A.1, from the Tower Bridge North Bastion to the Outstanding Universal Value of the World Heritage Site*’. The Bury House site sits within the City Cluster, at its eastern edge, and would extend to the height contours shown in Figure 15 and Policies Maps related to Policy S12 of the draft Plan. It is therefore evident that CoL has already identified and confirmed that buildings following the contours of the draft



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policy within this area will result in substantial heritage harm to the ToL WHS and protected views, and would not be compliant with other draft Plan policies and national policy and guidance.

For these reasons, HRP maintains that MM47 is ineffective in dealing with the contradictions identified within the draft Plan between policies that aim to protect the ToL WHS (HE1, HE2, HE3, HE4) and those that permit tall buildings in the City Cluster at a height that will result in significant heritage and visual harm in respect of the protected views of the ToL and key views from within it.

- **MM49:** HRP notes the proposed modification MM49 (Policy S12, part 3), which requires tall buildings to be designed to ‘respect heritage significance’, in addition to respecting townscape character. HRP welcomes the intention of this wording however it does not agree that this amendment is sufficient to address the effectiveness of this policy and the Plan as a whole since it does not represent adequate resolution of the significant contradiction between the buildings heights to be permitted in the City Cluster and the policies/parts of policies within the draft Plan that aim to preserve heritage assets, including the ToL, as set out above.
- **MM56:** HRP does not support the proposed modification MM56, which amends the City Cluster tall buildings contours at the south-eastern edge/corner. This expands the area in which taller buildings will be permitted as part of the City Cluster and increases the permitted height for tall buildings within parts of the proposed City Cluster. It will serve to bring the City Cluster closer to the ToL WHS and increase the likelihood that development within the cluster will appear in the backdrop of the ToL and therefore also increase the likelihood that development will impact the OUV of the WHS. This further undermines the efficacy of policies in the draft Plan that seek to protect the WHS. HRP understands these amendments have been driven by the needs of specific developments that are expected to be brought forward during the life of the draft Plan. HRP has repeatedly and consistently requested that these contours be revised and the heights reduced and has clearly set out the reasons why these amendments are required in order to protect the heritage significance of the ToL and minimise harm to the OUV of the WHS from development in the City Cluster. HRP is therefore disappointed that the Examination process has resulted in these contours being expanded and the maximum heights increased.



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Conclusion

Overall, HRP does not believe that the proposed main modifications address the issues of soundness set out in HRP's representations to the draft Local Plan, including those raised in its hearing statements in relation to Main Matter 7, and do not adequately reflect the evidence base for the draft Plan. The fundamental issue that the City Cluster, following the proposed contours, will significantly and adversely impact the OUV of the WHS has not been addressed and, in the case of proposed modification MM56, are worsened. This is contradictory to the policies in the draft Plan that seek to protect heritage significance and, in the context of risk to the WHS status of the ToL, is of grave concern to HRP. As such, HRP maintains that the draft Plan is not justified, effective or consistent with national policy and therefore fails to meet the test of soundness in plan-making.

HRP would be pleased to discuss this response with the Inspector and/or CoL at its convenience, should any further clarification or discussion of the issues raised be helpful. For any correspondence, [REDACTED]

Yours faithfully

[REDACTED]

Andrew Jackson

Tower Director